

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LAMINE ZEROUAL,)
v.)
Plaintiff,)
v.)
JOHN ASHCROFT, et. al.,)
Defendants.)

C.A. No. 03-12246-GAO

02/20/2004 10:47

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**DEFENDANTS' MOTION TO EXTEND TIME
IN WHICH TO RESPOND TO PLAINTIFF'S WRIT OF MANDAMUS**

Now comes the above-captioned Defendants,¹ and hereby move this Court for an extension of time **up to and including** **March 31, 2004**, to answer or otherwise respond to Plaintiff's Writ of Mandamus. As reasons therefore, the undersigned counsel for Defendants asserts that such an extension will allow the Assistant U.S. Attorney the additional time to obtain relevant facts and background information of this matter from the relevant agency (Department of Homeland Security).

WHEREFORE, Defendants respectfully request that this Court allows its motion for an extension of time **up to and including**

¹ This motion is not intended to be a responsive pleading. By the filing of this motion, Defendants are not waiving any of the procedural, affirmative, or other waivable and non-waivable defenses available to it in the normal course of filing a responsive pleading. Defendants intend to raise those defenses when it answers or otherwise responds to the Petition.

March 31, 2004, to answer or otherwise respond to the Petition.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: Michael P. Sady
Assistant U.S. Attorney
John Joseph Moakley U.S. Courthouse
Suite 9200
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(617) 748-3100

Dated:

CERTIFICATE OF SERVICE

I certify that on February 20, 2004, I caused a copy of the foregoing Motion to be served by first class mail, postage prepaid to Plaintiff at 428 Great Road, Apt. 13, Acton, MA 01720.

Michael P. Sady
Assistant U.S. Attorney

CERTIFICATION UNDER L.R. 7.1

Pursuant to Local Rule 7.1(a)(2), the parties have conferred to narrow the issues of this motion.

Michael P. Sady
Assistant U.S. Attorney